

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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XIANHUA ZHANG

Plaintiff,

v.

ING DIRECT

Defendant.

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Case No. 07-555 (JJF)

**DEFENDANT ING BANK, FSB'S INITIAL DISCLOSURES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Defendant ING Bank, fsb ("ING Bank"), improperly identified in the Complaint as ING Direct, by and through its undersigned attorneys, makes the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. These disclosures are subject to supplementation and/or modification, and they are provided without prejudice to or waiver of any privilege or objection ING Bank may have to any subsequent discovery by Plaintiff.

**I. Individuals Likely to Have Discoverable Information That ING Bank May Use to Support Its Defenses.**

**A. Kelley Yohe**

Ms. Yohe has knowledge pertaining to Plaintiff's employment with ING Bank; Plaintiff's job duties, performance and workplace conduct; Plaintiff's compensation at ING Bank; the circumstances concerning Plaintiff's separation; and the allegations Plaintiff makes about her and other allegations in the Complaint. Ms. Yohe may only be contacted through counsel for ING Bank.

B. Naomi Seramone

Ms. Seramone has knowledge pertaining to Plaintiff's employment with ING Bank; Plaintiff's job duties, performance and workplace conduct; Plaintiff's compensation with ING Bank; the circumstances concerning Plaintiff's separation; and other allegations in the Complaint. Ms. Seramone may only be contacted through counsel for ING Bank.

C. Yan Shi

Mr. Shi has knowledge pertaining to Plaintiff's employment with ING Bank; Plaintiff's job duties, performance and workplace conduct and other allegations in the Complaint.

**II. Description of All Documents in Defendant's Possession, Custody, or Control That It May Use to Support Its Defenses.**

- A. Documents concerning Plaintiff's job performance when employed by ING Bank.
- B. Plaintiff's EEOC Charge of Discrimination and related documents.
- C. Documents subsequently produced by either party and any non-party during discovery.

Defendant reserves the right to supplement this list.

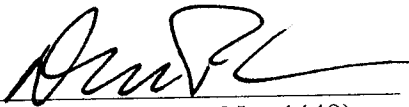
**III. Computation of damages claimed by Defendant.**

Defendant does not claim damages at present.

**IV. Insurance Agreements Under Which An Insurance Business May Be Liable To Satisfy or to Indemnify or Reimburse Defendant ING Bank for All or Part of a Judgment.**

Defendant ING Bank is currently investigating whether it has any insurance policy that will satisfy, indemnify or reimburse it for any judgments concerning this lawsuit and will supplement its response as appropriate.

Dated: February 27, 2008

  
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